

REMARKS

Claims 1-23 were pending in the application. Claims 1, 4, 9-11, 13 and 15-21 have been amended. No new matter has been added in the application by the amendments.

Specification objections

The disclosure was objected to because of informality. The specification has been amended to insert the description of Figures 5a and 5b on page 6, as suggested by the Examiner. Thus, withdrawal of the specification objection is respectfully requested.

Claim Rejections Under 35 U.S.C. § 102

Claims 1-20 were rejected under 35 U.S.C. § 102(c) as being anticipated by US 6,049,786 to Smorodinsky (hereinafter "Smorodinsky") for the reasons stated on pages 2-4 of the Office Action.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Smorodinsky, however, does not disclose or teach each and every element as set forth in claim 1, as follows.

Claim 1 has been amended to recite a method of automatically tracking and balancing account receivable data for a given carrier, comprising determining each of said customer account records as one of at least two tracking data sets based on pre-defined criteria.

In claim 1, each of the customer account records is analyzed based on the pre-defined criteria, and then determined as one of at least two different tracking data sets. Thus, the customer account records are grouped in the at least two tracking data sets, and the customer account records in the same tracking data set are processed together. On the contrary, a bill summary (SBILL), in Smorodinsky, is set as a bill status code of "1" once the bill summary is posted. The bill status code of the bill summary is changed according to the status of the bill summary. That is, the bill status of the bill summary, in Smorodinsky, is not for grouping predetermined bill summaries, but simply indicates the status of the bill summary. Thus, Smorodinsky does not disclose or teach determining

each of said customer account records as one of at least two tracking data sets based on pre-defined criteria, as claimed in claim 1.

Further, claim 1 compares the input (i.e., the total amount of pre-processed accounts receivable) of the processing entity to the output of the processing entity (i.e., the total amount of processed accounts receivable). On the contrary, Smorodinsky compares a decrypted hash with new recomputed hash for a complete bill to avoid cheating by a biller and/or a customer. That is, Smorodinsky does not compare the input (i.e., sales and service data (12 in Fig. 1 of Smorodinsky)) of a bill computer (10-n) to the output (complete bill) of the bill computer (10-n), but compares the decrypted digitally signed hash to the new recomputed hash for the complete bill. Thus, the message indicating whether the discrepancy exists, in Smorodinsky, is not related to the comparison result of the input and output of the bill computer (10-n).

Accordingly, Smorodinsky does not disclose or teach comparing the total amount of pre-processed accounts receivable related to said given Carrier to the total amount of processed accounts receivable related to said Carrier; creating a discrepancy report comprising said Carrier if the total amount of pre-processed accounts receivable do not equal the total amount of processed accounts receivables; and creating a settlement report for said Carrier if the total amount of pre-processed accounts receivable submitted equals the total amount of processed accounts receivable, as claimed in claim 1.

Thus, Smorodinsky does not anticipate or render obvious claim 1. Claims 2-15 depend from claim 1, thus include all of the limitations of claim 1. Claims 2-15 are believed to be allowable due to their dependency on claim 1.

Claim 16 has been amended to recite a system for automatically tracking and balancing account receivable data comprising: a Carrier submitting a billing data file to a processing entity, said billing data file comprising customer account records representing accounts receivable for said Carrier; and the processing entity, determining each of said customer account records as one of at least two tracking data sets based on pre-defined criteria; computing the total amount of accounts receivable located in each tracking data set related to said Carrier; comparing the total amount of pre-processed accounts receivable related to said Carrier to the total amount of processed accounts receivable related to said Carrier; creating a discrepancy report comprising said Carrier if the total

amount of pre-processed accounts receivable do not equal the total amount of processed accounts receivables; and creating a settlement report for said Carrier if the total amount of pre-processed accounts receivable submitted equals the total amount of processed accounts receivable. Support for the amendment can be found in paragraphs [0032] – [0038] on pages 9-11 of the specification.

Claim 16 is believed to be allowable for at least the reasons given for claim 1. Claims 17-20 depend from claim 16, thus includes all the limitations of claim 16. Thus, claims 17-20 are believed to be allowable due to their dependency on claim 16.

Thus, withdrawal of the claim rejections under 35 U.S.C. § 102(e) is respectfully requested.

Claim Rejections under 35 U.S.C. 103:

Claims 21-23 were rejected under 35 U.S.C. 103(a) as being unpatentable over Smorodinsky in view of US 6,070,150 to Remington et al. (hereinafter "Remington") for the reasons stated on page 5 of the Office Action.

Remington discloses a bill presentment and payment remittance system for use over an electronic network. Remington focuses on directly controlling a format for presenting bill or integrating smoothly with entrenched account systems. However, Remington does not teach or suggest the processing entity, determining each of said customer account records as one of at least two tracking data sets based on pre-defined criteria; computing the total amount of accounts receivable located in each tracking data set related to said Carrier; comparing the total amount of pre-processed accounts receivable related to said Carrier to the total amount of processed accounts receivable related to said Carrier; creating a discrepancy report comprising said Carrier if the total amount of pre-processed accounts receivable do not equal the total amount of processed accounts receivables; and creating a settlement report for said Carrier if the total amount of pre-processed accounts receivable submitted equals the total amount of processed accounts receivable, as claimed in claim 16.

Thus, Remington does not cure the deficiency of Smorodinsky. Accordingly, the combination of Smorodinsky and Remington does not render obvious claim 16. Claims 21-23 depend from claim 16. Claims 21-23 are believed to be allowable due to their dependency on claim 16.

Thus, withdrawal of the claim rejections under 35 U.S.C. § 103(a) is respectfully requested.

Conclusion

In view of the foregoing remarks and amendments, Applicant submits that the above-identified application is now in condition for allowance. Early notification to this effect is respectfully requested.

If there are any charges with respect to this response or otherwise, please charge them to Deposit Account 06-1130 maintained by Applicant's attorneys.

Respectfully submitted,

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